

NELSON MULLINS RILEY & SCARBOROUGH LLP

Monee Takla Hanna (SBN 259468)
19191 South Vermont Avenue, Suite 900
Torrance, CA 90502
Telephone: 424.221.7400
Facsimile: 424.221.7499
monee.hanna@nelsonmullins.com

Attorneys for Defendant
BOSTON SCIENTIFIC CORPORATION

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BORIS TRIPOLSKIY, an individual,

Plaintiff,

vs.

BOSTON SCIENTIFIC
CORPORATION, a Delaware
corporation; and DOES 1 to 20,
inclusive,

Defendants.

Case No.:

Hon. Percy Anderson

**DECLARATION OF MONEE
TAKLA HANNA IN SUPPORT OF
DEFENDANT BOSTON
SCIENTIFIC CORPORATION'S
MOTION TO DISMISS**

*[Filed concurrently with Notice of
Removal]*

I, Monee Takla Hanna, declare as follows:

1. I am an attorney at law duly authorized to practice before all Courts of the State of California. The facts stated hereunder are true, known to me of my own personal knowledge, and if called as a witness, I could and would competently testify thereto.

2. I am an attorney at Nelson Mullins Riley & Scarborough LLP, attorneys of record for Defendant Boston Scientific Corporation ("Defendant" or "Boston Scientific") in this matter.

1 DATED: May 17, 2023

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

2
3
4 By: /s/ Monee Takla Hanna

5 Monee Takla Hanna

6 Attorneys for Defendant

BOSTON SCIENTIFIC CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and I served a copy of the foregoing pleading on all counsel for all parties, via the CM/ECF system and/or mailing same by United States Mail, properly addressed, and first-class postage prepaid, to all counsel of record in this matter.

/s/ Monee Takla Hanna
Monee Takla Hanna